

Timothy E. Kronquist
Direct Dial (414) 227-1224

COOK & FRANKE S. C.
ATTORNEYS AT LAW
880 EAST MASON STREET
MILWAUKEE, WISCONSIN 53202-3877

TELEPHONE (414) 271-8900
FACSIMILE (414) 271-2002

MEMBER
COMMERCIAL LAW AFFILIATES,
INDEPENDENT BUSINESS & LITIGATION LAW FIRMS,
WORLDWIDE

August 27, 1999

VIA FACSIMILE & OVERNIGHT MAIL

Lawrence M. Noble, General Counsel
Lois G. Lerner, Associate General Counsel
Eugene Bull, Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Aug 30 3 19 PM '99
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL

Re: MUR 4913/Ryan For Congress Committee
Our File: 6328-1

Dear Messrs. Noble and Bull and Ms. Lerner:

As you know from my letter to Mr. Bull dated August 18, 1999, and the signed Statement of Designation of Counsel included therein, I represent the Ryan for Congress Committee ("RFCC") in the above-referenced matter. Also as indicated in the August 18, 1999 letter my client desires to enter into a preprobable cause conciliation agreement with the FEC on mutually acceptable terms

The RFCC staff and Treasurer concluded their investigation of the circumstances surrounding the events between October 15 and October 31, 1998, which formed the basis of the Commission's MUR in this instance. The results show that on October 19, 1998, the RFCC had over 150 deposits on nine (9) different deposit sheets. The RFCC Assistant Treasurer (who was a volunteer and it was her first time in such a capacity) truly believed she reported all of the \$1,000 or more contributions by facsimile to the Commission. Nonetheless, despite the good faith efforts of the Assistant Treasurer and the RFCC staff, when the 48 Hour Notices were prepared, the preparer did not have all nine (9) deposit sheets and mistakenly accounted for only two (2) of the nine (9) deposit sheets. Additionally, according to the RFCC inquiry and based on the Thirty-Day Post-General Report, 22 contributions were involved on October 19, and on October 28 one (1) additional contribution went unintentionally unreported within the 48 hour deadline. The total number of contributions involved is 23. (See RFCC Summary attached hereto as Schedule A and incorporated herein).

Therefore, on October 19 and October 28 the RFCC reported less than all of the 48 Hour Notices to the Commission by facsimile within the deadline. However, the RFCC did report all of the

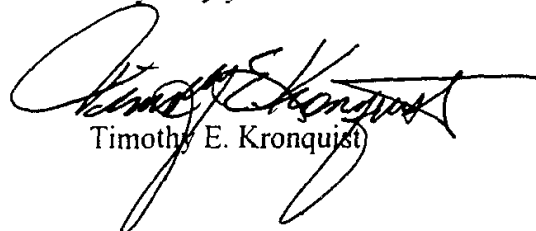
August 27, 1999

inadvertently omitted contributions contained in the remaining seven (7) deposit sheets for October 19 and the one (1) outstanding contribution of October 28 in the Thirty-Day Post-General Report as indicated in the Commission's "Legal and Factual Analysis."

The RFCC acknowledges that disclosure reports such as the 48 Hour Notice form the basis the federal election campaign finance laws and commits itself to upholding the integrity of the system. Congressman Ryan, RFCC Treasurer Larry Everhart, and the RFCC staff (both paid and volunteers) sincerely apologize for the mistake and apologize for the Commission having to pursue this inquiry. The RFCC assures the Commission the RFCC is implementing stricter controls and methods of greater cross-checking information regarding the preparation and filing of not only the 48 Hour Notices but also all required disclosure reports.

The discrepancy, in short, was a mistake. The RFCC respectfully requests the Commission to take into consideration the following mitigating circumstances surrounding this error. First, the RFCC did not willfully, intentionally, or knowingly fail to comply with the 48 Hour Notice requirement. The occurrence was purely unintentional and simply an oversight. The RFCC staff worked in good faith and gave their best efforts to comply with all campaign finance regulations. The RFCC did not try to hide or otherwise intentionally omit these contributions, and the information was reported in the Thirty-Day Post-General Report. Second, the period during which the discrepancy occurred was in the few weeks before the general election. As you know this is a time of intense activity including long hours and a hectic environment with much of the work performed by unpaid volunteers. Unfortunately such an environment is conducive to a mistake. Third, this was the first time ever Congressman Ryan ran for political office, and he was in a hotly contested race for an open seat. Although the RFCC staff was thoroughly instructed about the reporting procedures and the critical importance of full and timely compliance, the oversight that occurred was that of unseasoned personnel.

Very truly yours,



Timothy E. Kronquist

Enclosures

cc: Hon. Paul D. Ryan (via facsimile only)

Schedule A:
Findings by Ryan for Congress

1.	Alice Clark	10.19	\$1000
2.	Edward Cove	10.19	\$1000
3.	David Jones	10.19	\$1000
4.	James Lynch	10.19	\$1000
5.	Robert Mathias	10.19	\$1000
6.	Nancy McCutcheon	10.19	\$1000
7.	Jennifer Nauert	10.19	\$1000
8.	Jean Savage	10.19	\$1000
9.	John Ward	10.19	\$1000
10.	Keep Our Majority PAC	10.19	\$1000
11.	Chrysler PAC	10.19	\$1000
12.	Buck McKeon For Congress	10.19	\$1000
13.	Precision Machine Products	10.19	\$1000
14.	Sunshine PAC	10.19	\$1000
15.	Bill Thomas Campaign PAC	10.19	\$1000
16.	Good Year PAC	10.19	\$1500
17.	Business Industry PAC	10.19	\$2000
18.	American Trucking PAC	10.19	\$2000
19.	Bell Atlantic PAC	10.19	\$3000
20.	Deer & Co PAC	10.19	\$3000
21.	Stone PAC	10.19	\$5000
22.	RNC	10.19	\$5000
23.	Robert Kasten	10.28	\$1000
	Total		\$37,500